

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS (BOSTON)**

IN RE VASO ACTIVE PHARMACEUTICALS
SECURITIES LITIGATION

No. 1:04-CV-10708-RCL

RICHARD PAGONA,

CONSOLIDATED

Plaintiff,)

No. 1:04-CV-11100-RCL

VASO ACTIVE PHARMACEUTICALS, INC.,)
JOHN J. MASIZ, STEPHEN G. CARTER,)

Defendants.

EDWARD A. TOVREA,

No. 1:04-CV-10851-RCL

Plaintiff,)

VASO ACTIVE PHARMACEUTICALS, INC.,)
JOHN J. MASIZ, JOSEPH FRATTAROLI,)

Defendants.

KIM BENEDETTO, Individually and On
Behalf of All Others Similarly Situated,

No. 1:04-CV-10808-NG

JOSEPH BENEDETTO, Individually and On
Behalf of All Others Similarly Situated,

Plaintiffs,)

VASO ACTIVE PHARMACEUTICALS, INC.,
JOHN J. MASIZ, JOSEPH FRATTAROLI,

Defendants.

| | | |
|---|---|-----------------------|
| DEAN DUMMER, Individually and On Behalf |) | |
| of All Others Similarly Situated, |) | No. 1:04-CV-10819-NG |
| |) | |
| Plaintiff |) | |
| |) | |
| v. |) | |
| |) | |
| VASO ACTIVE PHARMACEUTICALS, INC., |) | |
| JOHN J. MASIZ, JOSEPH FRATTAROLI, |) | |
| STEPHEN G. CARTER, |) | |
| |) | |
| Defendants. |) | |
| <hr/> | | |
| RICHARD SHAPIRO, Individually and On Behalf |) | |
| of All Others Similarly Situated, |) | No. 1:04-CV-10720-NG |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| VASO ACTIVE PHARMACEUTICALS, INC., |) | |
| JOHN J. MASIZ, JOSEPH FRATTAROLI, |) | |
| |) | |
| Defendants. |) | |
| <hr/> | | |
| JAMES KARANFILIAN, Individually and On |) | |
| Behalf of All Others Similarly Situated, |) | No. 1:04-CV-11101-RCL |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | |
| VASO ACTIVE PHARMACEUTICALS, INC., |) | |
| STEPHEN G. CARTER, JOHN J. MASIZ, |) | |
| |) | |
| Defendants. |) | |

**THE ALIPOUR GROUP’S MOTION FOR CONSOLIDATION, APPOINTMENT AS
LEAD PLAINTIFF AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL**

Movants Kourosh Alipour, Timmy Smith and Douglas Weymouth (collectively the “Alipour Group”) move the Court pursuant to Fed. R. Civ. P. 42(a) and Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”), 15 U.S.C. §78u-4(a)(3)(B), as

amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for an order: (a) consolidating the above-styled securities class actions and any subsequently filed related actions; (b) appointing the Alipour Group as Lead Plaintiff in the consolidated action and in any consolidated related action; and (c) approving the Alipour Group’s selection of Federman & Sherwood as Lead Counsel and Alan L. Kovacs as Liaison Counsel.

In support of its motion, the Alipour Group submits: (1) a Memorandum of Law in Support of the Motion of the Alipour Group for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel, and (2) the Declaration of William B. Federman in Support of the Motion of the Alipour Group for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Lead Counsel.

Dated: June 7, 2004

Respectfully submitted,

s/Alan L. Kovacs

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of June, 2004, a true and correct copy of the above and foregoing instrument was mailed by First Class Mail, with sufficient postage prepaid thereon, to:

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